

STEPHEN R. BASSER (121590)  
sbasser@barrack.com  
SAMUEL M. WARD (216562)  
sward@barrack.com  
BARRACK, RODOS & BACINE  
One America Plaza  
600 West Broadway, Suite 900  
San Diego, CA 92101  
Telephone: (619) 230-0800  
Facsimile: (619) 230-1874

*Attorneys for the Port Authority of Allegheny County Retirement and  
Disability Allowance Plan for Employees Represented by Local 85 of the  
Amalgamated Transit Union*

CHRISTOPHER J. KELLER  
ckeller@labaton.com  
JOSEPH A. FONTI  
jfonti@labaton.com  
LABATON SUCHAROW LLP  
140 Broadway  
New York, NY 10005  
Telephone: (212) 907-0853  
Facsimile: (212) 883-7053

*Attorneys for the New Orleans Employees' Retirement System*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION**

FRED JEAN, Individually and on	)	Case No. 8:09-CV-01304-JVS
Behalf of All Others Similarly Situated,	)	<u>CLASS ACTION</u>
	)	
Plaintiffs,	)	ORAL ARGUMENT REQUESTED
v.	)	DATE: February 8, 2010
	)	TIME: 1:30 p.m.
STEC, INC., MANOUCH	)	CTRM: 10C
MOSHAYEDI, and MARK	)	Honorable James V. Selna
MOSHAYEDI,	)	
	)	
Defendants.	)	

**NOTICE OF MOTION AND MOTION TO CONSOLIDATE  
RELATED CASES, APPOINT CO-LEAD PLAINTIFFS AND APPROVE  
OF CO-LEAD PLAINTIFFS' SELECTION OF CO-LEAD COUNSEL**

HADI SAKHAI, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

STEC, INC., MANOUCH  
MOSHAYEDI, MARK MOSHAYEDI,  
RAYMOND D. COOK, J.P. MORGAN  
SECURITIES INC., DEUTSCHE  
BANK SECURITIES INC.,  
BARCLAYS CAPITAL INC. and  
OPPENHEIMER & CO. INC.,

Defendants.

Case No. 8:09-CV-01306-JVS

CLASS ACTION

FRED GREENWALD, Individually and  
on Behalf of All Others Similarly  
Situating,

Plaintiff,

v.

STEC, INC., MANOUCH  
MOSHAYEDI, and MARK  
(MERHADAD) MOSHAYEDI

Defendants.

Case No. 8:09-CV-01315-JVS

CLASS ACTION

DANIEL MUNTER, Individually and  
on Behalf of All Others Similarly  
Situating,

Plaintiff,

v.

STEC, INC., MANOUCH  
MOSHAYEDI, MARK MOSHAYEDI,  
AND RAYMOND D. COOK,

Defendants.

Case No. 8:09-CV-01320-JVS

CLASS ACTION

1 MARCEL WEINBERGER, Individually) Case No. 8:09-CV-01460-CJC  
2 and on Behalf of All Others Similarly )  
3 Situated, ) CLASS ACTION  
4 )  
5 Plaintiff, )  
6 v. )  
7 )  
8 STEC, INC., MANOUCH )  
9 MOSHAYEDI, MARK MOSHAYEDI, )  
10 AND RAYMOND D. COOK, )  
11 )  
12 Defendants. )

8 JONATHAN FISCHER, Individually) Case No. 2:09-CV-08536-JVS  
9 and on Behalf of All Others Similarly )  
10 Situated, ) CLASS ACTION  
11 )  
12 Plaintiff, )  
13 v. )  
14 )  
15 STEC, INC., MANOUCH )  
16 MOSHAYEDI, MARK MOSHAYEDI, )  
17 AND RAYMOND D. COOK, )  
18 )  
19 Defendants. )  
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1 **TO: ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that on February 8, 2010 at 1:30 p.m., or as  
3 soon thereafter as the matter may be heard, before the Honorable James V.  
4 Selna, United States District Judge, 411 West Fourth Street, Santa Ana,  
5 California, Courtroom 10C, the Port Authority of Allegheny County Retirement  
6 and Disability Allowance Plan for Employees Represented by Local 85 of the  
7 Amalgamated Transit Union ("ATU 85"), by its undersigned attorneys, and the  
8 New Orleans Employees' Retirement System ("New Orleans"), by its  
9 undersigned attorneys, will, and hereby do, move this Court, pursuant to Section  
10 21D(a)(3)(B) of the Securities Exchange Act of 1934 ("Exchange Act"), 15  
11 U.S.C. § 78u-4(a)(3)(B), as added by Section 101(a) of the Private Securities  
12 Litigation Reform Act of 1995, Pub. L. 104-67, 109 Stat. 737 ("PSLRA"), for an  
13 Order: (1) consolidating all related actions; (2) appointing ATU 85 and New  
14 Orleans as Co-Lead Plaintiffs in this litigation for all claims asserted by  
15 purchasers of the securities of STEC, Inc. ("STEC" or the "Company"); and (3)  
16 approving their choice of counsel, the law firms of Barrack, Rodos & Bacine,  
17 and Labaton Sucharow LLP as Co-Lead Counsel in this action.

18 The motion to appoint ATU 85 and New Orleans as Co-Lead Plaintiffs in  
19 this litigation for all claims asserted by purchasers of STEC securities, and to  
20 approve their selection of Co-Lead Counsel, is based upon their status as the  
21 most adequate plaintiffs under the PSLRA and the qualifications of their  
22 proposed counsel. In support of their motion, ATU 85 and New Orleans rely  
23 upon the following Memorandum of Points and Authorities, the Declaration of

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1 Samuel M. Ward dated January 5, 2010, including the Certifications of ATU 85  
2 and New Orleans, the pleadings filed in this case, and such other written or oral  
3 argument as may be presented to the Court.

4  
5 DATED: January 5, 2010

BARRACK RODOS & BACINE

6 /s/ STEPHEN R. BASSER

7 STEPHEN R. BASSER

8 Stephen R. Basser  
9 Samuel M. Ward  
10 One America Plaza  
11 600 West Broadway, Suite 900  
12 San Diego, California 92101  
13 Telephone: (619) 230-0800  
14 Facsimile: (619) 230-1874  
15 E-mail: sbasser@barrack.com  
16 sward@barrack.com

17 BARRACK, RODOS & BACINE  
18 Daniel E. Bacine  
19 3300 Two Commerce Square  
20 2001 Market Street  
21 Philadelphia, PA 19103  
22 Phone: (215) 963-0600  
23 Facsimile: (215) 963-0838  
24 Email: dbacine@barrack.com

25 *Attorneys for the Port Authority of*  
26 *Allegheny County Retirement and*  
27 *Disability Allowance Plan for*  
28 *Employees Represented by Local 85 of*  
*the Amalgamated Transit Union*

1 DATED: January 5, 2010

LABATON SUCHAROW LLP

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CHRISTOPHER J. KELLER

4 Christopher J. Keller  
5 Joseph A. Fonti  
6 140 Broadway  
7 New York, NY 10005  
8 Telephone: (212) 907-0853  
9 Facsimile: (212) 883-7053  
10 ckeller@labaton.com  
11 jfonti@labaton.com

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Attorneys for the New Orleans Employees'  
Retirement System